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8 Attorney for Defendants REYHAN PASINLI and  
9 TOTAL-APPS, INC.

10

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 DAVID HOUGH; ) Case No.: 2:24-cv-02886-WLH-SK  
14 AMUND THOMPSON; )  
15 ISABEL RAMOS; ) Assigned for all purposes to:  
16 ANTHONY RAMOS; )  
17 MICHAEL NIBARGER, ) Hon. Judge Wesley L. Hsu  
18 Plaintiff, )  
19 vs. )  
20 RYAN CARROLL; ) **STIPULATION TO STAY DEFENDANT**  
21 MAX K. DAY; ) **TOTAL-APPS, INC.'S AND REYHAN**  
22 MAX O. DAY; ) **PASINLI'S TIME TO FILE A RESPONSE**  
23 MICHAEL DAY; ) **PLEADING TO PLAINTIFFS' SECOND**  
24 JARED DAY; ) **AMENDED COMPLAINT**  
25 MATTHEW CROUCH; )  
26 CHRISTINE CARROLL; ) Complaint filed: April 9, 2024  
27 TROY MARCHAND; ) First Amended Complaint filed: May 20, 2024  
28 BONNIE NICHOLS; ) Second Amended Complaint filed: December  
29 TRAVIS MARKER; ) 4, 2024  
30 REYHAN PASINLI; )  
31 YAX ECOMMERCE LLC; PRECISION )  
32 TRADING GROUP, LLC; )  
33 WA DISTRIBUTION LLC; )  
34 PROVIDENCE OAK PROPERTIES, LLC; )  
35 WA AMAZON SELLER LLC; )  
36 YAX IP AND MANAGEMENT INC. (D.B.A. )  
37 "FULFILLABLE"); )  
38 MKD INVESTMENT ADVISOR, LLC; )  
39 MKD FAMILY BENEFICIARY, LLC; )  
40 )

1 MKD FAMILY PRIVATE MANAGEMENT )  
2 COMPANY, LLC; )  
3 MAX DAY CONSULTING, LLC; )  
4 HOUTEX FARM EQUITY PARTNERS LLC; )  
5 BUSINESS FINANCIAL SOLUTIONS )  
6 ADVISORY LLC; )  
7 EVO MAXX LLC; )  
8 WWKB LLC; )  
9 DREAMS TO REALITY LLC; )  
10 QUANTUM ECOMMERCE, LLC; )  
11 WHOLESALE UNIVERSE, INC.; )  
12 THE LAW OFFICE OF TRAVIS R. MARKER, )  
13 A PROFESSIONAL CORPORATION (D.B.A. )  
14 “MARKER LAW AND MEDIATION”); )  
15 PARLAY LAW GROUP A PROFESSIONAL )  
16 CORPORATION; )  
17 TOTAL-APPS, INC.; )  
18 WELLS FARGO BANK, N.A., )  
19 Defendants. )

20 Plaintiffs DAVID HOUGH, AMUND THOMPSON, ISABEL RAMOS, ANTHONY  
21 RAMOS, and MICHAEL NIBARGER (“**Plaintiffs**”) and Defendants TOTAL-APPS, INC. (“**Total**  
22 **Apps**”) and REYHAN PASINLI (“**Pasinli**”, and collectively with Total Apps, “**Defendants**”), by  
23 and through their respective counsel, hereby stipulate as follows:

24 WHEREAS, Plaintiffs filed their Second Amended Complaint on or about December 4,  
25 2024.

26 WHEREAS, on December 13, 2024, the Court vacated jurisdictional defendants’ pending  
27 motion to dismiss the First Amended Complaint, and ordered jurisdictional defendants to respond  
28 to the Second Amended Complaint by February 14, 2025.

29 WHEREAS, Counsel for Defendants and Counsel for Plaintiffs have agreed to extend  
30 Defendants’ deadline to respond to the Second Amended Complaint to February 14, 2025, the same  
31 date as the jurisdictional defendants’ deadline to respond to the Second Amended Complaint.

32 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Plaintiffs and  
33 Defendants, through their respective counsel, that:

34 ///

35 ///

1 Defendants deadline to respond to the Second Amended Complaint is on or before February  
2 14, 2025.

3 **IT IS SO STIPULATED.**

4  
5 Dated: December 23, 2024

WATTS LAW LLP  
Attorneys at Law

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7  
8 By: /s/ Geoffrey C. Brethen  
9 GEOFFREY C. BRETHEN  
10 Attorney for Defendants REYHAN PASINLI  
11 and TOTAL-APPS, INC.

12 Dated: December 23, 2024

13 BANKS LAW OFFICE

14 By: /s/ Nico Banks  
15 NICO BANKS  
16 Attorney for Plaintiffs DAVID HOUGH,  
17 AMUND THOMPSON, ISABEL RAMOS,  
18 ANTHONY RAMOS, and MICHAEL  
19 NIBARGER

1 **WORD COUNT COMPLIANCE CERTIFICATION**

2 The undersigned, counsel of record for Defendants REYHAN PASINLI and TOTAL-APPS,  
3 INC., certifies that this brief contains fewer than 7,000 words, which complies with the word limit  
4 of L.R. 11-6.1

5  
6 Dated: December 23, 2024

7 */s/ Geoffrey C. Brethen*

Geoffrey C. Brethen

8 **ATTESTATION**

9 Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf  
10 the filing is submitted, concur in the filing's content and have authorized the filing.

11  
12 Dated: December 23, 2024

13 */s/ Geoffrey C. Brethen*

14 Geoffrey C. Brethen

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA )  
3 ) ss:  
4 COUNTY OF ORANGE )

5 I am employed in the County of Orange, State of California, at the law firm of WATTS  
6 LAW LLP (9900 Research Drive, Irvine, California 92618). I am over the age of 18 and not a party  
7 to the within action.

8 On December 24, 2024, I served, in the manner indicated below, the foregoing  
9 document described as **STIPULATION TO STAY DEFENDANT TOTAL-APPS, INC.'S AND  
REYHAN PASINLI'S TIME TO FILE A RESPONSE PLEADING TO PLAINTIFFS'  
SECOND AMENDED COMPLAINT** on the interested parties to this action as follows:

10 Counsel for Plaintiffs DAVID HOUGH and  
AMUND THOMPSON

11 Richard A. Nervig  
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14 Counsel for Plaintiffs DAVID HOUGH;  
MOULLOUD HOCINE; JENNIFER  
LEHMKUHL HILL; AMUND THOMPSON;  
PAUL PANICO; MICHAEL NIBARGER;  
ISABEL RAMOS; and ANTHONY RAMOS  
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16 Counsel for Defendants RYAN CARROLL;  
MAX K. DAY; MAX O. DAY; MICHAEL  
DAY; YAX ECOMMERCE LLC;  
PRECISION TRADING GROUP, LLC; WA  
DISTRIBUTION LLC; PROVIDENCE OAK  
PROPERTIES, LLC; WA AMAZON SELLER  
LLC; MKD INVESTMENT ADVISOR, LLC;  
MKD FAMILY BENEFICIARY, LLC; MKD  
FAMILY PRIVATE MANAGEMENT  
COMPANY, LLC; MAX DAY  
CONSULTING, LLC; HOUTEX FARM  
EQUITY PARTNERS LLC; BUSINESS  
FINANCIAL SOLUTIONS ADVISORY LLC;  
EVO MAXX LLC, YAX IP AND  
MANAGEMENT INC.; WWKB LLC; and  
DREAMS TO REALITY LLC

17 William H. Shibley  
18 Lloyd and Mousilli PLLC  
19 11807 Westheimer Road  
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1  (BY ELECTRONIC MAIL) I caused the aforementioned document(s) to be served via  
2 electronic mail to the electronic addressee(s) listed on the attached mailing list. Such  
3 document was transmitted successfully from my e-mail address to the indicated addressee(s).

4 I declare under penalty of perjury under the laws of the State of California that all the  
5 foregoing is true and correct. Executed on December 24, 2024, at Irvine, California.

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Allie Ward, Declarant